

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

In the Matter of)
) CC Docket No. 92-77
 Billed Party Preference)
 for 0+ InterLATA Calls)

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 FEDERAL COMMUNICATIONS COMMISSION
 SECRETARY

REQUEST FOR EXTENSION OF TIME

The undersigned Joint Parties hereby respectfully request additional time in which to comment on the Commission's June 6, 1994, Further Notice of Proposed Rulemaking in the above-captioned proceeding.¹ Specifically, for the reasons stated below, the Joint Parties request that the deadline for comment on the Further NPRM be extended from July 8 to August 8, 1994, and that the reply comment date be extended from July 29 to September 12, 1994.

The extension is requested for three reasons: First, the Commission seeks comment on a plethora of "billed party preference" ("BPP") issues. A number of these issues will require detailed analysis of the Commission's tentative conclusions on the costs and benefits of BPP and assembly of additional data and studies. For example, the FCC seeks comment on the analysis in the agency's TOCSIA Report and whether the data therein are current (§ 11). Additionally, parties disputing the FCC analysis of BPP benefits have been urged to submit empirical data to support their claims (§ 18).

¹ *Billed Party Preference for 0+ InterLATA Calls*, CC Docket No. 92-77, FCC 94-117 (June 6, 1994) ("Further NPRM").

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Parties have also been asked to consider the impact of wireless and other new technologies (*id.*), OSP costs of BPP implementation (§ 28), alternatives for achieving the benefits that the FCC claims for BPP (§ 38), the effects of BPP on OSP, payphone, and local exchange services competition (§§ 32-35), the impact of BPP on small businesses (Statement of Chairman Reed Hundt at the May 19, 1994, FCC open meeting; § 50), the effectiveness of BPP in controlling fraud over inmate institution lines (§ 51), appropriate methods to recover the costs of BPP implementation (§ 59), and the relative costs of fourteen-digit vs ten-digit screening (§ 74). This sampling of topics on which comment is sought is by no means exhaustive.

While the Joint Parties are proceeding diligently with their analysis and assembly of data in support of their comments on these and other issues raised by the Further NPRM, they submit that the thoroughness and usefulness of the record will be enhanced immeasurably if an additional month is provided for comments. As the Commission notes, its tentative conclusions in the Further NPRM are based on a largely stale record, and it intends to "proceed cautiously" on this matter (§ 84).

Concomitantly, judging by the intensity of participation in this proceeding to date, the volume of material to be filed should be substantial. The review and analysis thereof in support of reply comments will probably necessitate more than the three weeks provided for in the Further NPRM. Accordingly, the Joint Parties respectfully request that an additional two weeks be provided for reply comments.

Second, an extension of the periods for comments and reply comments would be an effective measure to reduce the prospects for a repetition in this docket of a multitude of detailed *ex parte* filings after the comment cycle has ended. It is certain that *ex parte* filings will inevitably be prepared and filed following the comment cycle. Nevertheless, the Joint Parties submit that the extensions will allow parties to develop more fully the substantive data and analysis requested in their initial comments so as to permit parties to make their primary reply thereto within the scheduled comment cycle.

Third, the requested extension would assist parties in working around the vacation schedules of key personnel and consultants during the summer months. Moreover, the current comment deadline immediately follows a major holiday weekend. Similarly, an additional two weeks are requested for reply comments so as to avoid the holiday weekend at the end of the summer.

The Joint Parties recognize the FCC's interest in completing this proceeding as expeditiously as possible. The Commission itself, however, in the Further NPRM, acknowledges the staleness and incompleteness of the existing record. Accordingly, the Joint Parties submit that it is in the best interest of all parties to allow a 30-day extension for comments and a two-week extension for replies. The requested extensions will assist in the development, through the formal cycle of comments and replies, of a more comprehensive record on which the FCC can base its decision. Thus, contrary to any appearance of possible delay, the requested extension serves the Commission's objection of a timely resolution of this rulemaking.

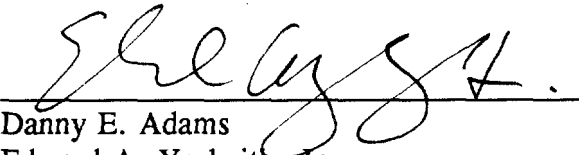
This Request has been reviewed by counsel for AT&T and BellSouth Corporation who each have indicated that they have no objection to the requested extension.

In conclusion, for the foregoing reasons, the Commission should extend the deadlines for comment on the Further NPRM to August 8, 1994 and for reply comment to September 12, 1994.

Respectfully submitted,

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June 15, 1994

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of June, 1994, I caused copies of the foregoing
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